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PROMOTE PROTECT PROSPER

South Carolina Department of Health and Environmental Control

Office of Environmental Quality Control
Bureau of Air Quality
Synthetic Minor Construction Permit

Coveris Flexibles US LLC
345 Cedar Springs Avenue
Spartanburg, South Carolina 29302
Spartanburg County

Pursuant to the provisions of the *Pollution Control Act*, Sections 48-1-50(5) and 48-1-110(a), the 1976 *Code of Laws of South Carolina*, as amended, and *South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards*, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit application received on January 26, 2016, as amended. All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

Permit Number: **2060-0075-CN**
Issue Date: **ISSUED DATE**

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Director, Engineering Services Division
Bureau of Air Quality

A. PROJECT DESCRIPTION

Permission is hereby granted to construct new Flexograpghic Press #150 (P150). The press will consist of ten printing decks, one direct-fired between-color dryer, one direct-fired tunnel dryer, and one corona treater. The emissions will be controlled by the existing regenerative oxidizer (RT01).

Existing equipment will be removed in order to install the new press with its auxiliary equipment. Equipment to be removed is: Press 160 (P160), 4.13 million BTU/hr natural gas fired VPI Hot Oil Heater (HOT-1), and Gravure Pre-Make Area (GPM01).

B.1 EQUIPMENT

Equipment ID	Equipment Description*	Control Device ID	Emission Point ID
P150	Flexo Press #150 -1,640 fpm flexographic printing press using solvent-based inks with one (I) 0.209-MMBtu/hr between-color dryer, one (I) 0.360-MMBtu/hr tunnel dryer, and one (I) corona treater.	RT01	S-RTO

*Note, no water based inks are to be utilized, thus the RTO is always operating when this press is running.

B.2 CONTROL DEVICES

Control Device ID	Control Device Description	Pollutant(s) Controlled
RTO-1	(EXISTING) 8.3 million BTU/hr Natural Gas Regenerative Thermal Oxidizer (Megtec Cleanswitch-400-96), 40,000-scf maximum design capacity	VOC/HAPs

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.1	**Equipment/Control Device ID:** All (S.C. Regulation 61-62.1, Section II.J.1.g) A copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. The owner or operator shall maintain such operational records; make reports; install, use, and maintain monitoring equipment or methods; sample and analyze emissions or discharges in accordance with prescribed methods at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least 5 years from the date the record was generated and shall be made available to a Department representative upon request.
C.2	**Equipment/Control Device ID:** P150 / RTO-01 The owner/operator shall inspect, calibrate, adjust, and maintain continuous monitoring systems, monitoring devices, and gauges in accordance with manufacturer's specifications or good engineering practices. The owner/operator shall maintain on file all measurements including continuous monitoring system or monitoring device performance measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required in a permanent form suitable for inspection by Department personnel.

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.3	**Equipment/Control Device ID:** P150 / RTO-01 All gauges shall be readily accessible and easily read by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Monitoring parameter readings (i.e., pressure drop readings, etc.) and inspection checks shall be maintained in logs (written or electronic), along with any corrective action taken when deviations occur. Each incidence of operation outside the operational ranges, including date and time, cause, and corrective action taken, shall be recorded and kept on site. Exceedance of operational range shall not be considered a violation of an emission limit of this permit, unless the exceedance is also accompanied by other information demonstrating that a violation of an emission limit has taken place. Reports of these incidences shall be submitted semiannually. If no incidences occurred during the reporting period then a letter shall indicate such. Any alternative method for monitoring control device performance must be preapproved by the Department and shall be incorporated into the permit as set forth in S.C. Regulation 61-62.70.7.
C.4	**Equipment/Control Device ID:** P150 / RTO-01 For any source test required under an applicable standard or permit condition, the owner, operator, or representative shall comply with S.C. Regulation 61-62.1, Section IV - Source Tests. Unless approved otherwise by the Department, the owner, operator, or representative shall ensure that source tests are conducted while the source is operating at the maximum expected production rate or other production rate or operating parameter which would result in the highest emissions for the pollutants being tested. Some sources may have to spike fuels or raw materials to avoid being subjected to a more restrictive feed or process rate. Any source test performed at a production rate less than the rated capacity may result in permit limits on emission rates, including limits on production if necessary. The owner or operator shall comply with any limits that result from conducting a source test at less than rated capacity. A copy of the most recent Department issued source test summary letter, whether it imposes a limit or not, shall be maintained with the operating permit, for each source that is required to conduct a source test. Site-specific test plans and amendments, notifications, and source test reports shall be submitted to the Manager of the Source Evaluation Section, Bureau of Air Quality.
C.5	**Equipment/Control Device ID:** P150 / RTO-01 (S.C. Regulation 61-62.5, Standard No. 4, Section IX) Where construction or modification began after December 31, 1985, emissions from this source (including fugitive emissions) shall not exhibit an opacity greater than 20%. RTO-01: The permittee shall implement a program for routine inspection and subsequent maintenance on all control device equipment. Control device maintenance events shall be recorded in a permanent form suitable and available for inspection by representatives of the Department. These records shall be retained for at least five years following the date of such maintenance.

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.6	**Equipment/Control Device ID:** Facility-wide Less than 250 tpy VOC emissions; SC Reg. 61-62.5, Std. 7, SC Reg 61-62.1, Sec. II, (H) Less than 10 tpy (each HAP) and less than 25 tpy (combined HAPS) The owner/operator shall maintain records of all volatile organic compounds (VOC) and hazardous air pollutants (HAP). These records shall include the total amount of each material used, the VOC content in percent by weight of each material, the HAP content in percent by weight of each material, and any other records necessary to determine VOC and HAP emissions. VOC and HAP emissions shall be calculated on a monthly basis, and a twelve-month rolling sum shall be calculated for total VOC, individual HAP, and total HAP emissions. Emissions from malfunctions are required to be quantified and included in the calculations. The twelve-month rolling sum shall be less than 250 tons/year of VOC tons and less than 10/25 tons/year of single/total HAPs. Reports of the calculated values and the twelve-month rolling sum, calculated for each month in the reporting period, shall be submitted semiannually. An algorithm, including example calculations and emission factors, explaining the method used to determine emission rates shall only be included in the initial report. Subsequent submittals of the algorithm are required within 30 days of the change if the algorithm or basis for emissions is modified or the Department requests additional information. The owner or operator must keep on site for a period of 5 years, or until the source changes its operations to become an affected source, whichever comes first, a record of the applicability determination indicating the facility is an affected source, but is not subject to regulation under 40 CFR 63, Subpart A and Subpart KK, because of limitations on the source's potential to emit. The record of the detailed applicability determination, made in accordance with the requirements of Subparts A and Subpart KK and available guidance materials, must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source has taken federally enforceable limits to avoid major source status).
C.7	**Equipment/Control Device ID:** P150 / RTO-01 PM less than 0.5 lb/million BTU, Opacity less than 20% / SC Reg. 61-62.5, std. No. 3, Sec. III (I) The owner/operator shall perform a visual inspection on a semiannual basis. Visual inspection means a qualitative observation of opacity during daylight hours where the inspector records results in a log, noting color, duration, density (heavy or light), cause and correction action taken for any abnormal emissions. The observer does not need to be certified to conduct valid visual inspections. However, at a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, and observer position relative to lighting, wind, and the presence of uncombined water. No periodic monitoring for opacity will be required during periods of burning natural gas or propane only. Logs shall be kept to record all visual inspections, including cause and corrective action taken for any abnormal emissions and visual inspections from date of recording. The owner/operator shall submit semiannual reports. The report shall include records of abnormal emissions, if any, and corrective actions taken. If only natural gas was combusted or if the unit did not operate during the semiannual period, the report shall state so.

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.8	**Equipment/Control Device ID:** P150 / RTO-01 ≥95% (destruction), 100% (capture), 40 CFR 64 Initial test and test every 4 years from the date of the latest performance test **Monitoring/Record Keeping/Reporting/Other:** (RTO-01) When a regenerative thermal oxidizer is being used to control VOC emissions from presses 150, 160 & 120 with solvent-based inks, the Flexographic Solvent Parts Washer, and the Plate Maker, the owner/operator shall ensure that the regenerative thermal oxidizer is equipped and maintained with fully operational temperature sensors within the media bed or inter-bed chamber (combustion zone). All temperature indicators shall be readily accessible for verification by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Except during periods of startup, shutdown, and malfunction, temperature readings shall be recorded at least every fifteen (15) minutes and maintained on site for a period of at least five (5) years from the date generated and shall be made available to Department personnel upon request. The readings shall be maintained in logs (written or electronic (i.e., computerized data system)), along with any corrective action taken when deviations occur. The minimum operating combustion zone temperature shall be established to provide a reasonable assurance of compliance. The established minimum operating combustion zone temperature is not applicable during periods of startup, shutdown, malfunction, debugging, or non-operational periods that do not result in sufficient VOC load to the oxidizers. The minimum operating combustion zone temperature shall be derived from stack test data will demonstrate the proper operation of the RTO in compliance with its control destruction requirement of 95%. The minimum operating combustion zone temperature, with supporting documentation and quality assurance procedures, shall be submitted to the Bureau for approval within 30 days after each performance test of the RTO. The minimum operating combustion zone temperature may be updated using this procedure, following Bureau approval. (RTO-01, P150, 19 (P160), 19 (P120), 21 (PW01), 21 (PM01)) These sources are subject to 40 CFR 64, Compliance Assurance Monitoring and shall comply with all applicable provisions. To meet the requirements of 40 CFR 64 for Printing Presses 150, 160 & 120 of Emission Unit No. 19 and the Flexographic Solvent Parts Washer and Plate Maker of Emission Unit No. 21, the indicator for VOCs will be RTO combustion zone temperature. The owner/operator shall continue to operate, and maintain a thermocouple at the RTO combustion zone as the measurement approach. Combustion zone temperature shall be used to provide assurance of compliance with S.C. Regulation 61-62.5, Standard 7. The minimum operating combustion zone temperature for the RTO shall be computed as the time-weighted average of the values recorded during the latest performance test consisting of three (3) test runs of at least 1 hour each. The minimum combustion zone temperature for the monitored parameters is derived from data, which demonstrates a reasonable assurance of compliance. RTO combustion zone temperature readings shall be recorded at least every fifteen (15) minutes. QA/QC practices, etc. shall consist of (a)-(f) from the CAM plan. (a) The thermocouple(s) shall be accurate to within 1.0% of temperature measured or ±5°F, whichever is greater. A calibration check of the recording instrument will be conducted in accordance with OEM recommendations. Data is automatically recorded onto electronic media during monitoring and can be extracted from electronic media on demand. The data averaging period is 3 hours. Establish the indicator range of flow at a value greater than 85% of the average value measured during the most recent

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.8 cont.	capture efficiency performance test and use of engineering judgment. Monitoring an indicator of flow or flow itself will assure that adequate flow to achieve the designed capture rate is maintained. Data is manually recorded weekly in a log maintained on-site. Compare measured values to manufacturer's specifications and historical/expected values. Confirm proper operation and calibration of gauges annually by comparing to a calibrated meter, manometer, etc. (b) Inspections of the ductwork and dampers will ensure their integrity. For those presses where bypass valves are installed along the exhaust gas capture system to allow for exhaust gases to be diverted away from the RTO, inspection on an annual basis shall be undertaken to ensure proper operation of the valve or damper. (c) Since the RTO employs the use of a unique heat exchange media system to store and release heat, the chamber sequencing valves are an important design component. Accordingly, the chamber sequencing valves will also be checked periodically to verify that they are properly positioned during each heating and cooling cycle. The design and operation of the chamber valves will be documented during performance tests and verified during the periodic inspections. This will identify changes in operation that may impact control efficiency. (d) The presses connected to the RTO utilize dryers designed to operate under negative pressure and comprise the capture system. The dryer system and the airflow through the system are integral parts of the process designed by the manufacturer/installer. A properly balanced air system must be maintained in order to assure proper drying of the inks and coatings and product quality. Furthermore, a properly balanced air system must be maintained in order to assure that the exhaust gas is maintained below the lower LEL. Monitoring an indicator of flow (e.g. pressure) and maintaining flow at the proper level provides a reasonable assurance that the capture efficiency is being maintained. (e) An initial RTO emissions performance test will be conducted on the system. In addition, an emissions performance test on the RTO will be conducted at least every 4-years from the date of the latest performance test to demonstrate compliance with permit limits. Capture efficiency testing will be performed for each press, as applicable, during RTO performance testing. (f) The capture efficiency performance testing shall be limited to the initial performance test concurrent with the initial RTO performance test, provided: i. capture system flow rate indicators (e.g. flow gauges) are operated, calibrated, and maintained, and ii. the indicated values are maintained at a level no less than that recorded during the last source test during which compliance was verified, and iii. the type and location of the flow rate indicators are approved by this Department, and iv. no process, capture system, or VOC abatement equipment modifications have been made (Condition C.9.d). An excursion is defined as any operating condition where the 3-hr average temperature is less than 50°F of the average temperature demonstrated during the latest performance test. Upon detecting an excursion, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing any startup, shutdown or malfunction period and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion (other than those caused by excused startup and shutdown conditions).

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.8 cont.	A semiannual report for monitoring shall include, at a minimum, the information required under § 70.6(a)(3)(iii) and the following information as applicable: Summary information of the number, duration and cause (including unknown cause, if applicable) of excursions, as applicable, and the corrective actions taken; Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero span or other daily calibration checks, if applicable); If applicable, a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions occurring. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective action, and quality improvement plans,
C.9	**Equipment/Control Device ID:** P150 / RTO-01 ≥95% (destruction), 100% (capture), (40 CFR 64) An initial source test for VOC/HAP emissions shall be conducted within 180 days after startup and every 4 years thereafter. The source test will be used to show compliance with control efficiency (100% Capture, 95% Destruction).

D. RESERVED

E. RESERVED

F. AMBIENT AIR STANDARDS REQUIREMENTS

Condition Number	Condition
F.1	Air dispersion modeling (or other method) has demonstrated that this facility's operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in this demonstration may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. The emission rates used in the determination are listed in Attachment - Emission Rates for Ambient Air Standards of this permit. Higher emission rates may be administratively incorporated into Attachment - Emission Rates for Ambient Air Standards of this permit provided a demonstration using these higher emission rates shows the attainment and maintenance of any state or federal ambient air quality standard or with any other applicable requirement. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded. The owner/operator shall maintain this facility at or below the emission rates as listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations of this permit. Should the facility wish to increase the emission rates listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations in the body of this permit, it may do so by the administrative process specified above. This is a State Only enforceable requirement.

G. PERIODIC REPORTING SCHEDULE

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source.)	Report Due Date
Quarterly	January-March April-June July-September October-December	April 30 July 30 October 30 January 30
Semiannual	January-June April-September July-December October-March	July 30 October 30 January 30 April 30
Annual	January-December April-March July-June October-September	January 30 April 30 July 30 October 30
Note: This reporting schedule does not supersede any federal reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and 40 CFR Part 63. All federal reports must meet the reporting time frames specified in the federal standard unless the Department or EPA approves a change.		

H. REPORTING CONDITIONS

Condition Number	Condition
H.1	Reporting required in this permit, shall be submitted in a timely manner as directed in the Periodic Reporting Schedule of this permit.

H. REPORTING CONDITIONS

Condition Number	Condition
H.2	All reports and notifications required under this permit shall be submitted to the person indicated in the specific condition at the following address: **2600 Bull Street** **Columbia, SC 29201** The contact information for the local EQC Regional office can be found at: **http://www.scdhec.gov**
H.3	The owner/operator shall submit written notification to the Director of Engineering Services of the date construction is commenced, postmarked no later than 30 days after such date.
H.4	Unless elsewhere specified within this permit, all reports required under this permit shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality.
H.5	(S.C. Regulation 61-62.1, Section II.J) For sources not required to have continuous emissions monitors, any malfunction of air pollution control equipment or system, process upset or other equipment failure which results in discharges of air contaminants lasting for one hour or more and which are greater than those discharges described for normal operation in the permit application shall be reported to the Department's local Environmental Quality Control Regional office within 24 hours after the beginning of the occurrence. The owner/operator shall also submit a written report within 30 days of the occurrence. This report shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality and shall include, at a minimum, the following: 1. The identity of the stack and/or emission point where the excess emissions occurred; 2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions; 3. The time and duration of excess emissions; 4. The identity of the equipment causing the excess emissions; 5. The nature and cause of such excess emissions; 6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction; 7. The steps taken to limit the excess emissions; and, 8. Documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions.

I. PERMIT EXPIRATION AND EXTENSION

Condition Number	Condition
I.1	(S.C. Regulation 61-62.1, Section II.A.4) Approval to construct shall become invalid if construction: a. is not commenced within 18 months after receipt of such approval; b. is discontinued for a period of 18 months or more; or c. is not completed within a reasonable time as deemed by the Department. The Department may extend the construction permit for an additional 18-month period upon a satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.
I.2	This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

J. PERMIT TO OPERATE

Condition Number	Condition
J.1	(S.C. Regulation 61-62.1 Section II.F.2) The owner/operator or professional engineer in charge of the project shall certify that, to the best of his/her knowledge and belief and as a result of periodic observation during construction, the construction under application has been completed in accordance with the specifications agreed upon in the construction permit issued by the Department.
J.2	If construction is certified as provided in S.C. Regulation 61-62.1 Section II.F.2, the owner or operator, may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.
J.3	If construction is not built as specified in the permit application and associated construction permit(s), the owner/operator must submit to the Department a complete description of modifications that are at variance with the documentation of the construction permitting determination prior to commencing operation. Construction variances that would trigger additional requirements that have not been addressed prior to start of operation shall be considered construction without a permit.
J.4	(S.C. Regulations 61-62.1 Section II.F.3 and 61-62.70.7) The owner or operator shall submit a written request to the Director of the Engineering Services for a new or revised operating permit to cover any new or altered source postmarked no later than 15 days after the actual date of initial startup unless a more stringent time frame is required by regulation. The request should be made using the appropriate Title V modification form.

K. GENERAL CONDITIONS

Condition Number	Condition
K.1	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.
K.2	In the event of an emergency, as defined in S.C. Regulation 61-62.1, Section II.L, the owner or operator shall demonstrate the affirmative defense of an emergency through properly signed, contemporaneous operating logs, and other relevant evidence that verify: 1. An emergency occurred, and the owner or operator can identify the cause(s) of the emergency; 2. The permitted source was at the time the emergency occurred being properly operated; 3. During the period of the emergency, the owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and 4. The owner or operator gave a verbal notification of the emergency to the Department within 24 hours of the time when emission limitations were exceeded, followed by a written report within 30 days. The written report shall include, at a minimum, the information required by S.C. Regulation 61-62.1, Section II.J.1.c.i through viii. The written report shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. In any enforcement action, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency, or upset provision contained in any applicable requirement.

K. GENERAL CONDITIONS

Condition Number	Condition
K.3	(S.C. Regulation 61-62.1, Section II.O) Upon presentation of credentials and other documents as may be required by law, the owner or operator shall allow the Department or an authorized representative to perform the following: 1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit. 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. 3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit. 4. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

L. EMISSIONS INVENTORY REPORTS

Condition Number	Condition
L.1	All newly permitted and constructed Title V sources and/or Non-attainment Area Sources shall complete and submit an emissions inventory consistent with the schedule approved pursuant to S.C. Regulation 61-62.1, Section III. These Emissions Inventory Reports shall be submitted to the Manager of the Emissions Inventory Section, Bureau of Air Quality. This requirement notwithstanding, an emissions inventory may be required at any time in order to determine the compliance status of any facility.

ATTACHMENT - Emission Rates for Ambient Air Standards

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The emission rates listed herein are not considered enforceable limitations but are used to evaluate ambient air quality impact. Until the Department makes a determination that a facility is causing or contributing to an exceedance of a state or federal ambient air quality standard, increases to these emission rates are not in themselves considered violations of these ambient air quality standards (see Ambient Air Standards Requirements).

AMBIENT AIR QUALITY STANDARDS - STANDARD NO. 2						
Emission Point ID	**Exempted Emission Rates (lbs/hr)**					
	PM_{10}	**$PM_{2.5}$**	**SO_2**	**NO_x**	**CO**	**Lead**
108-117	0.0064	0.0064	0.005	0.084	0.070	--
110-117	0.0068	0.0068	0.0005	0.089	0.075	--
111-117	0.025	0.025	0.001	0.323	0.271	--
500-118	0.0064	0.0064	0.0005	0.084	0.070	--
501-118	0.0068	0.0068	0.0005	0.089	0.075	--
503-118	0.025	0.025	0.001	0.321	0.271	--
549-119	0.008	0.008	0.0006	0.100	0.084	--
550-119	0.008	0.008	0.0006	0.106	0.089	--
S-RTO	0.0761	0.0761	0.0060	0.5294	0.8424	--
Extrusion Laminator	0.039	0.039	0.039	--	--	--
Paper Trim Waste Baler	0.5980	0.5980	--	--	--	--
Process Facility Heating[(1)]	0.104	0.104	0.008	0.38	1.152	--
RTO	0.062	0.062	0.005	0.814	0.684	--
BLR-1	0.0285	0.0285	0.0023	0.3755	0.3154	--
BLR-2	0.0164	0.0164	0.0013	0.2157	0.1812	--

TOXIC AIR POLLUTANTS - STANDARD NO. 8		
POLLUTANT	**CAS NUMBER**	**Facility Wide Emission Rates (lbs/hr)**
Acetaldehyde	75-07-0	406.596
Dibutylphthalate	84-74-2	0.239
Ethanolamine	141-43-5	7.768
Ethylene Glycol	107-21-1	6.217
Formaldehyde	50-00-0	3.388
Hydrochloric Acid	7647-01-0	1.674
Methanol	67-56-1	12.530
Methyl Chloroform	71-55-6	91.345
Methyl-Isobutyl Ketone	108-10-1	19.608
Toluene	108-88-3	451.997
Vinyl Acetate	108-05-4	39.756

ATTACHMENT - Emission Rates for Ambient Air Standards

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TOXIC AIR POLLUTANTS - STANDARD NO. 8 – DE MINIMIS		
POLLUTANT	**CAS NUMBER**	**Facility Wide Emission Rates (lbs/day)**
Acrylic Acid	79-10-7	0.000
Benzene	71-43-2	0.066
Glycol Ethers	N/A	267.500
Hexane	110-54-3	1.510
Maleic Anhydride	108-31-6	0.003
Naphthalene	91-20-3	0.000
Propionaldehyde	123-38-6	0.002